

**Mona Deleon**

**From:** Angela\_Reynolds@longbeach.gov  
**Sent:** Thursday, February 03, 2005 10:20 AM  
**To:** mona.deleon@lsa-assoc.com  
**Subject:** RE: Sports Park EIR

Angela Reynolds, AICP  
 Advance, Community & Environmental Planning Officer  
 City of Long Beach  
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----- Forwarded by Angela Reynolds/CH/CLB on 02/03/2005 10:20 AM -----

"Lou Anna Denison" <lannd4animals@charter.net>

To: <Angela\_Reynolds@longbeach.gov>

cc:

Subject: RE: Sports Park EIR

02/02/2005 06:15 PM

Please respond to lannd4animals

Lou Anna Denison  
 6931 E. 11th St.  
 Long Beach, CA 90815  
 Angela Reynolds, Environment Office  
 Department of Planning and Building: Sports Park EIR  
 City of Long Beach  
 333 West Long Beach Blvd.  
 Long Beach, CA, 90802

RE: Sports Park EIR: (The italics will indicate quotations from the EIR)<?xml:namespace prefix  
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Although I have concerns about many issues such as traffic, public health issues (such as the  
 sale of fast foods and beer); financing of the project--the cost would be at least \$20 million  
 for the grading and construction of the pay-for-play commercial facility. (AND WHERE IS  
 THE COST OF "MITIGATION STATED?).Our city has a \$50 million deficit now; would the  
 taxpayers be expected to pay for another failed private financial venture?); lack of access to  
 neighborhood recreation and open space areas in the areas of the city where it is most needed;  
 the ignoring of the connection of the site to the history of the area, which was once a Native  
 American settlement, I am most concerned about the almost nonchalant dismissal of this  
 ecologically important area as an area that has little importance to the wildlife there-- both for  
 the wildlife and for the humans (both residents and ecotourists) that could have an opportunity  
 to enjoy a natural open space habitat.

Our Long Beach General Plan states that over 95% of our wetland have been destroyed and



that we need more wetlands History shows that this area was all wetlands. Even with all the human disturbances, the obligate wetland plants are coming back. Although the EIR states that the *total*/of wetlands plants (as determined by the LSA-backed surveyors) is about .6 acres, other surveys show that there are obligate wetland species in more like 26 acres!

#### 4.5-11:Wildlife:

A number of amphibians, mammals and birds, including the endangered loggerhead shrikes, are mentioned in this section, but dismissed as inhabitants of "*disturbed ruderal grassland*". They are there BECAUSE they aren't disturbed by human activity! The fact that they are there gives credence to the proposal to allow this much-needed open space to be preserved for wildlife as a wildlife preserve that would not only protect the wildlife, but would also give Long Beach children and adults an opportunity for wildlife viewing.

The EIR suggests that this could be easily mitigated. As mentioned before, obligate wetlands species are scattered throughout 26 acres; giving a TOTAL of the number of acres in which species found is ridiculous!

Does the project propose to leave a total of .6 or less acres of wetlands to supposedly satisfy the taking of 26 acres of scattered wetland plants and wildlife species to be designated in one small space?

Do you really believe that it is possible that cramming so many species in such a small space would allow them to survive? Do you really believe that a noisy, well-lighted, human-dominated commercial sports park would validate the stated: "*Impact to Migratory Birds: This area is expected to continue to serve a relatively minor function as a stopover in the "Pacific Flyway" used by birds during migration*" ?

Concerning the endangered loggerhead shrikes, the EIR states: "*Loggerhead shrikes would potentially use the adjacent cemetery for foraging due to the open space....*", do you believe that the above-mentioned tremendous negative impact of nearby human disturbance would just be ignored by such a sensitive species in such an unnatural environment? You can't herd birds like you can cattle; they return to the habitat and foraging grounds they have used for generations.

The reality is that mitigation in Long Beach hasn't worked; Long Beach has promised mitigation 26 times but it has never happened satisfactorily--either because of inappropriate location, too little space allowed, or no mitigation completed.

#### 5.4 Alternatives rejected by the Lead Agency: "*These included a passive park...*

The EIR states: "*The existing wetland on site has resulted from minimal maintenance of a constructed basin and is not related to the historic or prehistoric presence of wetlands that may have occurred as a result of a freshwater spring. Therefore the existing conditions on site are not considered to be biologically unique.*" " Whether they are "unique " or not, as stated before, obligate wetland species are there throughout the 26 acres, so why are they to be "rejected"?

#### 5.4.4 Alternative 4: Off-Site Alternatives:



It is stated that: "*Minimum size sports park is 35 acres--A smaller but still economically viable pay-for-play facility could be built on a site as small as 25 acres*"

(The reason given for taking a larger portion of the open space is that acreage is needed for children's soccer and golf fields. If the stated purpose of the commercial adult pay-for-play facility is to relieve the existing park playgrounds for children's sports teams, then if the facility were to be built, wouldn't children have more access to neighborhood parks for team sports including golf and soccer?)

If only 25 acres are required, then why couldn't the facility be built on the Hughes Industrial site? Human activities there would not disturb plant and animals species --or human neighbors!

Or why couldn't the facility be built in the proposed Boeing Douglas Park, a 260-acre site adjacent to the Long Beach Airport? Cost of purchase was given as the reason this level land was not considered. Is the value of the Willow Springs land being considered? Are our valuable open space and parks considered "free land"?

Why can't designation of just 25 acres out of 260 acres for open space/sports facility be one of the conditions for approval of the project?

Either of these locations would eliminate the very costly grading away of the tallest hill in Long Beach, the more costly toxic cleanup, and the extensive, expensive, appropriate mitigation for loss of 26 acres of wetland habitat.

On p.5-43, Table 5.c refers to the Willow Springs area as "vacant land".

Why is "vacant land" owned by all the taxpayers of Long Beach being given away for a *commercial*/pay-for-play sports facility, used by just those who for can afford to use it, instead of being available free open space for all Long Beach residents? If it is a for-profit facility, why must we furnish the land?

Given the stated concerns, I believe the only environmentally, socially, and economically acceptable alternative is the: NO PROJECT/ NO DEVELOPMENT ALTERNATIVE.

Sincerely,

## LOU ANNA DENISON

### **P-1-1**

This comment is introductory and does not contain any substantive statements or questions about the Draft EIR or the analysis therein. Therefore, no further response is necessary.

### **P-1-2**

This comment pertains to the potential cost of implementing the project and the source of funding. Costs related to implementation and operation of the Proposed Project are not germane to the subject environmental analysis. No further responses to comments regarding costs are warranted. Please see Response to Comment O-4-26.

### **P-1-3**

The comment pertains to “lack of access to neighborhood recreation and open space areas in the areas of the city where it is most needed.” The proposed Sports Park is intended to help the City meet its increasing demand for league athletics, particularly adult league sports, although the facilities would be available to youth leagues as well. It is anticipated that, by providing a specific location for league sports, the pressure on community and neighborhood parks throughout the City will be alleviated and that the local parks will be opened up for youth league and neighborhood use. Therefore, the Proposed Project is intended to increase access to neighborhood recreation areas throughout the City, including areas where the lack of park space is most acute.

### **P-1-4**

The comment states that the project site was once a Native American settlement. As noted in the Draft EIR, while this may or may not be the case, there is no physical evidence on site to indicate past use by Native Americans. However, mitigation is included that requires archaeological monitoring during grading activity to identify, preserve, and curate any cultural remains, if found. See Mitigation Measures 4.6.5 and 4.6.6. Please refer to Responses to Comments O-3 and O-5 for more information.

### **P-1-5**

The comment states that the ecological importance of the site has been dismissed in the Draft EIR. Please see Section 4.5 of the Draft EIR regarding biological resources for more information. As explained in Section 4.5, the biological resources on site were assessed for their significance under the requirements of CEQA. Not all wildlife and plant species are considered sensitive; in fact, the site is characterized overall by nonsensitive wildlife species and ornamental plant species that are common throughout the City and region. Potential impacts to common and ornamental species are not considered significant under CEQA unless they rise to a level that would substantially affect the regional distribution of those species. Although the site is characterized by common and ornamental species, the biological resources investigation did identify some sensitive resources on site, as described in Section 4.5.

**P-1-6**

Please refer to Response to Comment O-4-3 for information regarding the wetlands delineation methodology.

**P-1-7**

The comment states that the Draft EIR dismisses wildlife species that occur on the site because they are inhabitants of disturbed ruderal grassland. Wildlife species that were observed on the site are characterized based on their status in the region (i.e., whether they are listed, sensitive, or special interest species). The disturbed ruderal grassland habitat is described both to explain why the site is not utilized by a greater number sensitive species (which often are limited by particular native habitats) and to inform the reader that many of the species present are not native. The commentor's assertion that the Draft EIR dismisses wildlife species that occur on site because they are inhabitants of disturbed ruderal grassland is incorrect.

CEQA identifies the biological resources to be addressed as those that are sensitive species or habitats (as described by the CDFG or the U.S. Fish and Wildlife Service [USFWS], or adopted plans, policies, and regulations), and wetlands as defined by Section 404 of the Clean Water Act. The term "sensitive species" refers to those plants and animals occurring or that have the potential to occur on the property and are designated as endangered or rare (as defined by CEQA and its Guidelines), or of current local, regional, or State concern.

No federally listed, State-listed, proposed endangered, threatened, or sensitive plant species were observed on site during multiple surveys. No federally listed, State-listed, proposed endangered, or threatened wildlife species were observed on site during multiple surveys. The loggerhead shrike is a CDFG species of special concern and therefore may be considered a sensitive species. Species of special concern are taxa with populations that are declining seriously or otherwise highly vulnerable to human development. The loggerhead shrike has declined over the last decade throughout southwestern California. While the decline in population in this region reflects the population decline for this species in much of the United States, the problem is more acute in coastal Los Angeles County, where few breeding pairs of loggerhead shrikes are known to exist. The project impacts to the loggerhead shrike are characterized, and mitigation provided, in Section 4.5 of the Draft EIR. The Draft EIR concluded that the project's contribution to the cumulative loss of habitat for this species was a significant effect of the project, even with implementation of mitigation. Therefore, the commentor's assertion that the Draft EIR dismisses wildlife species that occur on the site because they are inhabitants of disturbed ruderal grassland is incorrect.

**P-1-8**

The comment states that the presence of wildlife on site supports the use of the project site as a wildlife preserve. Please see Response to Comment P-1-7. The use of the site as a wildlife preserve is within the discretion of the City Council. The preservation of the site in its current open condition would eliminate the potential impact to the observed pair of loggerhead shrike. However, no federally listed, State-listed, proposed endangered, threatened, or sensitive plant species were observed on site during multiple surveys. No federally listed, State-listed, proposed endangered, or threatened wildlife species were observed on site during multiple surveys. A nesting pair of loggerhead shrikes, a species that may be considered sensitive, was observed on the site.

**P-1-9**

Please see Response to Comment P-1-7. Please see the *Delineation of Wetlands and Jurisdictional Waters* report in Appendix E, Volume II of the Draft EIR for more information, including a definition of the five types of hydrophytic vegetation and wetland indicator status species. All of the vegetation/habitat types on site were identified and mapped using GIS. Please see Figure 4.5.1 in the Draft EIR. Please refer to Response to Comment O-4-3 for information regarding wetlands delineation methodology.

Based on this methodology, it was determined that there is 0.08 acre of wetlands characterized by cattail marsh in the channel, and 0.41 acre of wetlands in the detention basin. The commentor's assertion that there are 26 acres of wetlands or wetlands species on site is incorrect. Areas must be dominated by wetland species to even be considered as potential wetlands. The occurrence of "scattered wetland plants" does not constitute wetlands for either CEQA purposes or compliance with State and federal wetlands regulations.

**P-1-10**

Please see Response to Comment O-4-3 regarding wetlands delineation methodology. Wetland mitigation at a ratio of 2:1 for 0.08 acre of cattail marsh in the channel and 1:1 mitigation ratio for the 0.41 acre of wetlands in the detention basin is provided for in Mitigation Measure 4.5.4. These mitigation ratios are commensurate with the habitat value of the on-site wetlands.

**P-1-11**

Much of the wildlife that is present on site, including migratory birds, is attracted to the ruderal vegetation and ornamental species that characterize the existing setting of the project site. The Proposed Project includes ornamental landscaping that could be expected to attract the same and similar wildlife species that occur today. In addition, the landscaping in parkways, parks, and private property near the project site and throughout the City would also attract and support the same and similar wildlife species that are currently present on site. Therefore, the development of the project site is not expected to adversely affect wildlife species that are not classified or considered to be endangered, protected or sensitive, including migratory birds. The total amount of wildlife that utilizes the site may indeed be reduced due to the higher level of human activity and the change in the character of the vegetation. However, this in itself does not constitute a significant impact, due to the common status of this wildlife in the region.

**P-1-12**

The loggerhead shrike has declined over the last decade throughout southwestern California. While the decline in population in this region reflects the population decline for this species in much of the United States, the problem is more acute in coastal Los Angeles County, where few breeding pairs of loggerhead shrikes are known to exist. The project impacts to the loggerhead shrike are characterized, and mitigation provided, in Section 4.5 of the Draft EIR. The Draft EIR concluded that the project's contribution to the cumulative loss of habitat for this species was a significant effect of the project, even with the implementation of mitigation.

**P-1-13**

Mitigation is implemented in accordance with the requirements of CEQA, including Section 21081.6, and in accordance with the conditions of permits issued by regulatory agencies. The comment asserts that "Long Beach has promised mitigation 26 times but it has never happened satisfactorily." Without

additional specific information with regard to the projects and mitigations that the commentor is referring to, a more specific response cannot be provided.

**P-1-14**

The wetlands are not “rejected,” as stated in the comment. The Draft EIR is accurately characterizing the wetlands on site when it states that the wetlands were created as the result of an ill-maintained detention structure that allowed water to pond rather than to drain. Mitigation at a ratio of 2:1 for 0.08 acre of cattail marsh in the channel and 1:1 mitigation ratio for the 0.41 acre of wetlands in the detention basin is provided for in Mitigation Measure 4.5.4. Please refer to Response to Comment P-1-9 for more information regarding hydrophytic vegetation and wetland indicator species.

**P-1-15**

The comment summarizes information stated in the Draft EIR. The goal of the project is to develop an operationally self-sufficient Sports Park to meet the documented demand for an adult and youth league sports facilities, and to further the City’s objectives as outlined in the Open Space and Recreation Element (OSE), which encourages the provision of new recreation uses to meet the increasingly unmet recreational needs of residents. While an economically viable pay-for-play Sports Park could be operated without the soccer fields, the City Department of Parks, Recreation, and Marine has identified furthering the objective of meeting the need for league soccer fields as an important goal of the project. The Hughes Industrial site is inadequate in size to meet the City’s objective of operating an economically self-sustaining Sports Park that includes soccer fields, since the minimum site size to achieve these objectives is 35 acres.

There are other constraints to the viability of the contemplated site within the Hughes Industrial Park. The City does not own any portion of this site. The project site is located within Planned Development (PD) 26 and is zoned for light industrial uses. The General Plan also designates this site Land Use District (LUD) 9G, General Industrial. A Zone Change and General Plan Amendment would be required to allow a commercial Sports Park.

The industrial park is a comprehensively managed research and development/employment/light industrial center, and the owner, manager, and current business tenants may not have chosen to have a pay-for-play recreation use within its boundaries. A Sports Park use in this setting could require a change to the deed restrictions since it is unlikely that such a use and associated visual and operational effects would have been considered at the time the deed restrictions were written. The Hughes Industrial location does not meet the project objectives of developing a centrally located site within the City to provide for soccer and youth golf. This location is not within the City’s ownership or control, and does not meet the objective of minimizing costs to the City by developing the commercial Sports Park on a site that does not result in property condemnation and excessive site acquisition costs to the City.

**P-1-16**

See Response to Comment P-1-15.

**P-1-17**

Approval of the Boeing Douglas Park project preceded that of the Long Beach Sports Park, and the development entitlements are already in place. The Boeing Douglas Park project was considered as an alternative site to the Proposed Project but rejected due to development constraints. As stated in the

Draft EIR, the Boeing Douglas Park site is not available to the City to develop. Since the property is not currently under City ownership, it is anticipated that the acquisition cost would be prohibitively high.

In December 2004, the City adopted Development Standards for Planned Development (PD) 32 – Douglas Park. According to the Development Standards for PD-32, at build out Douglas Park will include 4 public parks that will total at least 9.3 gross acres. As stated on page 5-39 of the Draft EIR, the minimum site size for a Sports Park is 35-acres. PD-32 would not allow development of a Sports Park in areas designated for park use because of space constraints.

The primary constraint to developing the Boeing Douglas Park site with a Sports Park use is, therefore, the current planning effort and private ownership of the property, which has high value as a potential development site. A Sports Park may be permitted within the 29-acre area at Paramount Boulevard or the 83-acre area along Lakewood Boulevard, which are proposed for commercial uses. Development constraints include the Runway Protection Zone for Runway 12-30, which overlaps and restricts development of the Paramount Boulevard site. Also, the Paramount Boulevard site is not within the City of Long Beach. According to the Development Standards for PD-32, the 83-acre area along Lakewood Boulevard is intended to be consistent with the development standards of the commercial/industrial districts in the Long Beach Municipal Code. A zone change and a General Plan amendment would be required for development of the Sports Park in this area. Development of the Boeing Douglas Park site is not within the City's direct control, since the property is privately owned. While the City has the responsibility of discretionary approval to allow the proposed mixed-use development of the Boeing Douglas Park site, it does not control the development of the site and cannot require that a Sports Park be constructed. Also, the Boeing Douglas Park site will be developed over a 20-year period. The need for a commercial Sports Park facility in the City has been documented for more than 10 years, and it is the City's intent and desire to implement a Sports Park in the near-term future. Therefore, while it is possible that a commercial sports facility could be developed on the Boeing Douglas Park site, such development cannot be assured in either the short- or long-term.

**P-1-18**

This comment expresses an opinion about the proposed location of the project. Please refer to Responses to Comments P-1-15 and P-1-17. This opinion will be made available for consideration by the decision-makers as part of their determination regarding the Proposed Project.

**P-1-19**

The City is not proposing to "give away" the project site. As stated in Chapter 3.0, Project Description, it is the City's intent is to acquire and retain ownership of the assembled project site, with the exception of the commercial parcel on the corner of Spring Street and California Avenue, and to either use contract operators to manage the facilities or operate the project itself.

**P-1-20**

The commentor expresses an opinion that opposes the development of the project site. This opinion will be made available for consideration by the decision-makers as part of their determination regarding the Proposed Project. The comment does not contain any substantive statements or questions about the Draft EIR, and no further response is necessary.